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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 22-CR-20187

Plaintiff,

Hon. Thomas L. Ludington
United States District Judge

v.

Hon. Patricia T. Morris
United States Magistrate Judge

D-1 RICARDO DELGADO II,
D-2 GREGORY MARTIN HAYES,
D-3 AUSTIN ANTONIO SAUCEDO,
D-4 JONATHAN ORTIZ CORONADO,
D-5 ARISTEO VINCENTE DELGADO,
D-6 ADAM JUAN ROSAS,
D-7 MICHAEL ALLAN PRATT,
D-8 CHARLES ELLIS PARKS,
D-9 JARQUAZE ANTHONY TOWNSEND,
D-10 TEYANA LHAIJUAN FRILLS,
D-11 ANTWON SHIVERS,
D-12 ARISTEO RUEDA ROBELIN,
D-13 CECIL PEOPLES,
D-14 DOMINIC DEONTRAL RILEY, and
D-15 ANTHONY DEAN WATSON,

Defendants.

FILED
SEP 07 2022
U.S. DISTRICT COURT
FLINT, MICHIGAN

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
(21 U.S.C. §§ 846 and 841(a)(1))
Conspiracy to Possess with Intent to Distribute and to
Distribute Cocaine

D-1 RICARDO DELGADO II,
D-2 GREGORY MARTIN HAYES,
D-3 AUSTIN ANTONIO SAUCEDO,
D-4 JONATHAN ORTIZ CORONADO,
D-5 ARISTEO VINCENTE DELGADO, and
D-6 ADAM JUAN ROSAS,

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about March 22, 2022, in the Eastern District of Michigan, RICARDO DELGADO II, GREGORY HAYES, AUSTIN SAUCEDO, JONATHAN CORONADO, ARISTEO DELGADO, and ADAM ROSAS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(A)(ii).

Sentence Enhancement
(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))

Before D-1 RICARD DELGADO committed the offense charged in this count, RICARDO DELGADO had two final convictions for serious drug felonies, namely, a conviction under 21 U.S.C. §§ 846 and 841(a)(1), conspiracy to distribute a controlled substance, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, and a conviction under 21 U.S.C. § 841(a), attempt to possess with intent to distribute 500 grams or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Sentence Enhancement
(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))

Before D-2 GREGORY HAYES committed the offense charged in this count, GREGORY HAYES had a final conviction for a serious drug felony, namely, a conviction under MCL 333.7401, Delivery/Manufacture 50-499 grams of cocaine, heroin, or other narcotic, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT TWO
(21 U.S.C. §§ 846 and 841(a)(1))
Conspiracy to Possess with Intent to Distribute and to
Distribute Cocaine

D-1 RICARDO DELGADO II,
D-2 GREGORY MARTIN HAYES,
D-7 MICHAEL ALLAN PRATT,
D-8 CHARLES ELLIS PARKS, and
D-12 ARISTEO RUEDA ROBELIN

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about March 22, 2022, in the Eastern District of Michigan, RICARDO DELGADO II, GREGORY HAYES, MICHAEL PRATT, CHARLES PARKS, and ARISTEO ROBELIN, knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved five hundred or more grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(B)(ii).

Sentence Enhancement
(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))

Before D-1 RICARD DELGADO committed the offense charged in this count, RICARDO DELGADO had two final convictions for serious drug felonies, namely, a conviction under 21 U.S.C. §§ 846 and 841(a)(1), conspiracy to distribute a controlled substance, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, and a conviction under 21 U.S.C. § 841(a), attempt to possess with intent to distribute 500 grams or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Sentence Enhancement
(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))

Before D-2 GREGORY HAYES committed the offense charged in this count, GREGORY HAYES had a final conviction for a serious drug felony, namely, a conviction under MCL 333.74012A3, Delivery/Manufacture of 50-499 grams of cocaine, heroin, or other narcotic, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT THREE
(21 U.S.C. §§ 846 and 841(a)(1))
Conspiracy to Possess with Intent to Distribute and to
Distribute Cocaine

D-9 JARQUAZE ANTHONY TOWNSEND, and
D-10 TEYANA LHAIJUAN FRILLS,

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about May 5, 2022, in the Eastern District of Michigan, JARQUAZE TOWNSEND and TEYAN FRILLS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). The conspiracy as a whole involved five hundred grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, all of which is attributable to each defendant as a result of their own individual conduct, and the conduct of other conspirators reasonably foreseeable to each of them.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and 841(b)(1)(B)(ii).

COUNT FOUR
(21 U.S.C. §§ 846 and 841(a)(1))
Conspiracy to Possess with Intent to Distribute and to
Distribute Cocaine

D-9 JARQUAZE ANTHONY TOWNSEND, and
D-11 ANTWON GEORGEDON SHIVERS,

From a date unknown to the Grand Jury, but since at least the fall of 2021, to on or about May 5, 2022, in the Eastern District of Michigan, JARQUAZE TOWNSEND and ANTWON SHIVERS knowingly conspired and agreed together and with other persons, both known and unknown to the grand jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT FIVE
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

D-1 RICARDO DELGADO II

On or about March 22, 2022, in the Eastern District of Michigan, Northern Division, RICARDO DELGADO II knowingly possessed with intent to distribute more than five kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii).

**Sentence Enhancement
(21 U.S.C. §§ 841(b)(1)(A)(ii)(II))**

Before D-1 RICARDO DELGADO committed the offense charged in this count, RICARDO DELGADO had two final convictions for serious drug felonies, namely, a conviction under 21 U.S.C. §§ 846 and 841(a)(1), conspiracy to distribute a controlled substance, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense and a conviction under 21 U.S.C. § 841(a), attempt to possess with intent to distribute 500 grams or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

**COUNT SIX
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A))**

D-1 RICARDO DELGADO II

On or about March 22, 2022, in the Eastern District of Michigan, Northern Division, RICARDO DELGADO II, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), possession with intent to distribute cocaine;

in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT SEVEN

**Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))**

D-13 CECIL PEOPLES

On or about May 5, 2022, in the Eastern District of Michigan, Northern Division, CECIL PEOPLES knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT EIGHT

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A))**

D-13 CECIL PEOPLES

On or about May 5, 2022, in the Eastern District of Michigan, Northern Division, CECIL PEOPLES, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), possession with intent to distribute cocaine; in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT NINE
Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))

D-13 CECIL PEOPLES

On or about May 5, 2022, in the Eastern District of Michigan, CECIL PEOPLES, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Rock Island, model M1911, .45 caliber semi-automatic handgun; a HiPoint, model C9, 9mm caliber semi-automatic handgun; a Bersa, model Thunder, .380 caliber semi-automatic handgun; and a Walther, model PPS, 9mm semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1). The defendant, CECIL PEOPLES, having at least three previous convictions for a violent felony or a serious drug offense, committed on occasions different from one another, is subject to penalties provided under Title 18, United States Code, Section 924(e)(1).

COUNT TEN
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

D-14 DOMINIC DEONTRAL RILEY

On or about February 17, 2022, in the Eastern District of Michigan, Northern Division, DOMINIC RILEY knowingly possessed with intent to

distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT ELEVEN
Possession with Intent to Distribute Methamphetamine
(21 U.S.C. § 841(a)(1))

D-14 DOMINIC DEONTRAL RILEY

On or about February 17, 2022, in the Eastern District of Michigan, Northern Division, DOMINIC RILEY knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT TWELVE
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A))

D-14 DOMINIC DEONTRAL RILEY

On or about February 17, 2022, in the Eastern District of Michigan, Northern Division, DOMINIC RILEY, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), possession with intent to distribute cocaine and methamphetamine; in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT THIRTEEN
Felon in Possession of a Firearm
(18 U.S.C. § 922(g)(1))

D-14 DOMINIC DEONTRAL RILEY

On or about February 17, 202, in the Eastern District of Michigan, DOMINIC RILEY, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Smith & Wesson, model M&P Shield, 9mm caliber semi-automatic handgun; and a Glock, model 22, .40 caliber semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN
Possession with Intent to Distribute Cocaine Base
(21 U.S.C. § 841(a)(1))

D-15 ANTHONY DEAN WATSON

On or about May 5, 2022, in the Eastern District of Michigan, Northern Division, ANTHONY WATSON knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT FIFTEEN

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(18 U.S.C. § 924(c)(1)(A))**

D-15 ANTHONY DEAN WATSON

On or about May 5, 2022, in the Eastern District of Michigan, Northern Division, ANTHONY WATSON, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, 21 U.S.C. § 841(a)(1), possession with intent to distribute cocaine base in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT SIXTEEN

**Use of a Communication Facility
(21 U.S.C. § 843(b))**

D-1 RICARDO DELGADO II

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, RICARDO DELGADO II knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and

841(a)(1), as set forth in Counts One and Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTEEN
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-2 GREGORY MARTIN HAYES

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, GREGORY HAYES knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts One and Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT EIGHTEEN
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-3 AUSTIN ANTONIO SAUCEDO

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, AUSTIN SAUCEDO knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT NINETEEN
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-4 JONATHAN ORTIZ CORONADO

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, JONATHON CORONADO knowingly used and

caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-5 ARISTEO VINCENTE DELGADO

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ARISTEO DELGADO knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-ONE
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-6 ADAM JUAN ROSAS

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ADAM ROSAS knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count One of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-TWO
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-7 MICHAEL ALLAN PRATT

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, MICHAEL PRATT knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-THREE
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-8 CHARLES ELLIS PARKS

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, CHARLES PARKS knowingly used and caused

others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-FOUR
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-9 JARQUAZE ANTHONY TOWNSEND

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, JARQUAZE TOWNSEND knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Three and Four of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

TOUNT TWENTY-FIVE
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-10 TEYANA LHAJUAN FRILLS

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, TEYANA FRILLS knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine base, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Three of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SIX
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-11 ANTWON GEORGEDON SHIVERS

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ANTWON SHIVERS knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Four of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-SEVEN
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-12 ARISTEO RUEDA ROBELIN

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ARISTEO ROBELIN knowingly used and caused

others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, conspiracy to possess with intent to distribute and to distribute cocaine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Count Two of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-EIGHT
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-13 CECIL PEOPLES

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, CECIL PEOPLES knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count Seven of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-NINE
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-14 DOMINIC DEONTRAL RILEY

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, DOMINIC RILEY knowingly used and caused others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, possession with intent to distribute cocaine and methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count Ten and Eleven of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY
Use of a Communication Facility
(21 U.S.C. § 843(b))

D-15 ANTHONY DEAN WATSON

Beginning on a date unknown to the grand jury, but at least since the fall of 2021, and continuing at least until March 22, 2022, in the Eastern District of Michigan, Northern Division, ANTHONY WATSON knowingly used and caused

others to use a communication facility, that is a telephone, in committing, causing, and facilitating the commission of an act or acts constituting a felony under the Controlled Substances Act, that is, possession with intent to distribute cocaine base, in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count Fourteen of this indictment and incorporated by reference herein.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Thirty of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendants of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all

property involved in, or property traceable to, the violations alleged in this Indictment.

Dated: September 7, 2022

THIS IS A TRUE BILL

s/GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ANTHONY P. VANCE
ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

s/TIMOTHY TURKELSON
TIMOTHY TURKELSON
Assistant U.S. Attorney
600 Church Street, Suite 210
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(P53748)

Companion Case information MUST be completed by AUSA and initialed.

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 22-CR-20187
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TT

Case Title: USA v. RICARDO DELGADO, ET. AL.County where offense occurred : SAGINAWCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-mj-30214]
☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case InformationSuperseding to Case No: 22-CR-20187 Judge: Thomas L. Ludington

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
ARISTEO RUEDA ROBELIN, CECIL PEOPLES, DOMINIC DEONTRAL RILEY, and ANTHONY DEAN WATSON		

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 7, 2022
Date

s/TIMOTHY TURKELSON
 Timothy Turkelson
 Assistant United States Attorney
 210 Federal Building
 600 Church Street
 Flint, Michigan 48502
 Telephone: (810) 766-5177
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.